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April 1, 2002

TO:

Internal File

FROM:

James D. Smith, Sr. Reclamation Specialist/Team Lead JDS

RE:

Underground Abandonment of Long wall Conveyor-Pan Sections, Energy West

Mining Company, Deer Creek Mine, C/015/018-AB01F-2

## **SUMMARY:**

On July 16, 2001, Energy West submitted to the BLM a "Lease Term and Condition Modification Request, Removal of Machinery, Federal Lease U-06039." The same day, Energy West notified the Division concerning abandonment of mining equipment in the Deer Creek Mine. The notification included a sketch map identifying the location of the abandoned equipment, a list of the equipment, and a copy of the request to the BLM.

Energy West planned on final coal extraction from 9th East longwall panel by late August or early September 2001, and planned to remove all equipment except for 140 American Longwall (1 m x 1500 mm) conveyor line pans with gob and face side accessories, which consist of toe plates, clevises, cable trays, bretby trays, spill plates and dynatrac castings, conveyor chain, and flight bars. These pans were left in available entry crosscuts of the 9th and 10th East gate roads. No hoses, cables, lubricants, or oils of any kind were included in the abandoned equipment. Because of the worn condition of the pans and the low prices for scrap steel, Energy West considered it unreasonable and uneconomical to recover them.

Federal Coal Lease U06039 includes stipulations concerning abandonment of mining equipment underground: Section 10 - Delivery of Premises, Removal of Machinery, Equipment, Etc.; and Section 24 - Waste Certification, which documents abandonment of machinery within the federal coal lease. It is PacifiCorp and Energy West's understanding that the longwall units are not subject to the stipulations of the lease.

On December 5, 2001 (received December 7, 2001), the Permittee submitted a new Volume 2 - Part 3 that modifies the MRP to address actual abandonment of specific mining machinery and materials underground and also future abandonment of such items. It also updates or modifies several other sections of the MRP, such as mining projections that include high-ash coal from the Hiawatha Seam in Rilda Canyon and coal from the Blind Canyon Seam in the Mill Fork Lease. This is more than was envisioned when the Division asked the Permittee to submit an amendment to cover the underground equipment issue; however, the necessary information is provided and the other changes are not substantial and did not require extensive review.

Utah Coal Mining Rules require a coal mine operator to demonstrate steps to be taken to minimize disturbance to the hydrologic balance within the permit and adjacent areas and to prevent material damage outside the permit area. A TA (dated February 25, 2002) of the initial submittal was sent to the operator with two deficiencies. The operator's response was received March 6, 2002. Information on underground abandonment of equipment now meets the minimum regulatory requirements and approval of the amendment is recommended.

# **TECHNICAL ANALYSIS:**

# **OPERATION PLAN**

#### SPOIL AND WASTE MATERIALS

Regulatory Reference: 30 CFR Sec. 701.5, 784.19, 784.25, 817.71, 817.72, 817.73, 817.74, 817.81, 817.81, 817.83, 817.84, 817.87, 817.89; R645-100-200, -301-210, -301-211, -301-212, -301-412, -301-512, -301-513, -301-514, -301-521, -301-526, -301-528, -301-535, -301-536, -301-542, -301-553, -301-745, -301-746, -301-747.

#### **Analysis:**

#### Coal mine waste

Hydrologic Drainage Calculations for the Waste Rock Disposal area are summarized on pages 79 and 80: reference is made to Table 6.4 and other information in R645-301-500 - Exhibit D in the revision of Part 3.

## **Findings:**

The proposed amendment meets the minimum requirements for Operation Information for Spoil and Waste Materials of the Coal Mining Rules.

#### HYDROLOGIC INFORMATION

Regulatory Reference: 30 CFR Sec. 773.17, 774.13, 784.14, 784.16, 784.29, 817.41, 817.42, 817.43, 817.45, 817.49, 817.56, 817.57; R645-300-140, -300-141, -300-142, -300-143, -300-144, -300-145, -300-146, -300-147, -300-147, -300-148, -301-512, -301-514, -301-521, -301-531, -301-532, -301-533, -301-536, -301-542, -301-720, -301-731, -301-732, -301-733, -301-742, -301-743, -301-750, -301-761, -301-764.

#### Analysis:

# Acid and toxic-forming materials

There are commitments on page 76 concerning annual sampling of roof, floor, and midseam material, the analyses of these samples for acid- and toxic-forming materials, and the inclusion of the analysis results and maps of the sampling locations in the annual reports.

Exhibit C contains a summary of the analyses up through 1999. The analysis information and maps could not be found in the 2000 Annual Report.

## **Findings:**

The proposed amendment meets the minimum requirements of Operation Plan, Hydrologic Information of the Coal Mining Rules.

#### **RECOMMENDATIONS:**

Approval of the amendment is recommended.

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